

AARON D. FORD
Attorney General
DAVID A. BAILEY, Bar No. 13661
Deputy Attorney General
State of Nevada
100 N. Carson Street
Carson City, Nevada 89701-4717
Tel: (775) 684-1163
E-mail: dabailey@ag.nv.gov

*Attorneys for Defendants under
Limited Notice of Appearance for
Settlement Discussions only*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

SHANTEZ THROWER,

Plaintiff,

vs.

MICHAEL MINEV, M.D., et al.,

Defendants.

Case No. 3:21-cv-00171-MMD-CLB

**DEFENDANTS' MOTION FOR
EXTENSION OF STAY TO COMPLETE
SETTLEMENT**

Defendants, by and through counsel for settlement purposes only, Aaron D. Ford, Attorney General of the State of Nevada, and David A. Bailey, Deputy Attorney General, hereby notify this Court that the while the parties reached an agreement to settle this matter at the Early Mediation Conference on January 25, 2022, the parties have yet to execute a written settlement agreement. Counsel for Defendants held a meet-and-confer with Plaintiff via telephone after receiving a letter expressing confusion regarding the settlement agreement. The parties are in the process of finalizing the written settlement agreement and stipulation to dismiss, and request the Court to extend the current stay for 30 days to permit time for the parties to finalize the settlement agreement and submit a stipulation to dismiss this action.

///

///

///

///

1 WHEREFORE, Defendants respectfully request the Court to extend the current stay
2 of this matter until March 28, 2022.¹

3 DATED this 23rd day of February 2022.

4 AARON D. FORD
5 Attorney General

6 By: /s/ David A. Bailey
7 DAVID A. BAILEY, Bar No. 13661
8 Deputy Attorney General

9 *Attorneys for Defendants under
10 Limited Notice of Appearance for
11 Settlement Discussions Only*

12 IT IS SO ORDERED.

13 
14 U.S. MAGISTRATE JUDGE

15 DATED: February 25, 2022

16
17
18
19
20
21
22
23
24
25
26
27
28 ¹ Thirty days after February 24, 2022 is Saturday, March 26, 2022, so the date has
been adjusted to the next Court business day.

CERTIFICATE OF CONFERENCE

The undersigned certifies he held a telephonic meet-and-confer with Plaintiff and that Plaintiff is not opposed to extending the stay in this matter for 30 days.

By: /s/ David A. Bailey
DAVID A. BAILEY, Bar No. 13661
Deputy Attorney General

*Attorneys for Defendants under
Limited Notice of Appearance for
Settlement Discussions Only*

CERTIFICATE OF SERVICE

I certify that I am an employee of the Office of the Attorney General, State of Nevada, and that on this 23rd day of February 2022, I caused to be served a copy of the foregoing, **DEFENDANTS' MOTION FOR EXTENSION OF STAY TO COMPLETE SETTLEMENT**, by U.S. District Court CM/ECF Electronic Filing on:

Shantez Thrower #1044727
Lovelock Correctional Center
1200 Prison Road
Lovelock, Nevada 89419
lcclawlibrary@doc.nv.gov

/s/ Karen Easton
An employee of the Office
of the Attorney General